



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

RMT/DMP/AC
F.#2015R00600

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By ECF and Electronic Mail

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Re: United States v. Muhanad Mahmoud al-Farekh
Criminal Docket No. 15-268 (S-2)(BMC)

Dear Counsel:

The government writes, pursuant to Rule 16(a)(1)(G), to supplement its expert notices dated March 28, 2016 and June 26, 2017. The government further writes to disclose additional materials pursuant to Rule 16. These materials are produced pursuant to the Stipulation and Order entered by the Court on July 24, 2015. In addition, the government renews its request for reciprocal discovery, including any and all expert disclosures.

The government expects to call Lorenzo Vidino as an expert regarding al-Qaeda. Dr. Vidino is expected to testify regarding the history, leadership, infrastructure and geographic locations of al-Qaeda and its external operations division during the relevant time period outlined in the indictment; al-Qaeda terrorist training camps; specific acts of terrorism perpetrated by al-Qaeda; the background and significance of certain al-Qaeda affiliated groups such as Haqqani; al-Qaeda's media productions and media efforts; and the process of radicalization, including with respect to Anwar al-Awlaqi and his jihadi videotapes and sermons. Attached, for your reference, is Dr. Vidino's curriculum vitae, marked as 3500-LV-1. Further, marked as 3500-LV-2, is Dr. Vidino's recent testimony in another matter, and marked as 3500-LV-3, a report he prepared in another matter.

In addition, the government expects to call Federal Bureau of Investigation Special Agent Bomb Technician Peter Licata to testify as to the nature and destructive power of the explosives recovered from the January 2009 VBIED attack in Afghanistan. A copy of SABB Licata's curriculum vitae, marked as 3500-PL-1, is attached. Materials related to his testimony were produced to the defense on November 19, 2015 (bearing Bates numbers

